

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :
Sara M. Keenan : Chapter 13
: Case No.: 20-14061-AMC
Debtors(s) :

MOTION TO INCUR ADDITIONAL DEBT
IN SUPPORT OF REFINANCING MORTGAGE

Debtor, Sara M. Keenan, by and through Attorney Brad J. Sadek, respectfully moves this Honorable Court for an Order allowing the Debtor to Incur Additional Debt in support of Refinancing Mortgage and hereby avers as follows:

1. Debtor filed a Chapter 13 Bankruptcy on October 13, 2020.
2. The Chapter 13 Plan was confirmed by this Honorable Court on May 12, 2021.
3. The instant Bankruptcy was filed for the primary purpose of repaying mortgage arrears due and owing on the mortgage at the time of filing.
4. The Debtor has been pre-approved for a refinance with Loan Cabin, Inc.

A true and correct pre-approval letter dated October 15, 2021 and loan summary are attached hereto as **Exhibit “A.”**

5. The purpose of the subject refinance is to satisfy the existing mortgage loan balance, the Chapter 13 Plan and provide additional funds for the Debtor to make necessary home repairs.

WHEREFORE, the Debtor, by and through the undersigned counsel, requests this Honorable Court to enter an Order allowing the incurrence of additional debt in support of the refinance of the debtor's real property.

Dated: October 18, 2021

/s/Brad J. Sadek, Esq.

Brad J. Sadek, Esq.

Sadek and Cooper Law Offices

Attorney for Debtor

1315 Walnut Street

Suite #502

Philadelphia, PA 19107